

REMARKS

In the Office Action, all of the claims were rejected in view of the proposed combination of U.S. Patent No. 5,963,864 to O'Neil et al. and U.S. Patent No. 5,862,208 to McLampy et al. Applicants respectfully request reconsideration and withdrawal of these rejections. MPEP 2143.01 states that motivation to combine references is lacking if the proposed combination would change the principle of operation of a reference. Such is the case here.

McLampy et al. uses a tandem switch in an organization's Centrex switching system to receive an incoming call and initiate a call to a wireless phone upon a no-answer or busy condition (see col. 5, lines 37-63). In other words, McLampy et al. performs *consecutive* ringing of a Centrex line and a wireless phone — *not dual ringing*, as in O'Neil et al. By using a switch in an organization's Centrex system, the arriving call never totally leaves the fabric of the organization's telecommunications system, and access to all telecommunications coverage options provided by the Centrex line is retained (see col. 2, lines 26-36).

The proposed combination would change this basic principle of operation to one in which *dual* calls are initiated instead of *consecutive* calls. In other words, instead of using a component internal to the Centrex switching system to initiate a call to a wireless phone after a call is initiated to the Centrex line, an external component would initiate calls to both the Centrex line and the wireless phone. This would eliminate the very heart of McLampy et al. — that a call is always in the fabric of the Centrex system so that all Centrex options are retained. Because the proposed combination would change this basic operating principle, Applicants respectfully submit that one skilled in the art would not have been motivated to make the proposed combination.

Further, Applicants respectfully submit that the motivation offered in the Office Action does not support combining the references. The Office Action states that there would have been motivation to combine the references because the combination "would allow an improved method of call completion using an existing telecommunications network." However, this motivation is so broad that *any* telecommunications patent would be combinable with O'Neil et al. Clearly, a more specific motivation is needed. Without the required motivation, the rejections are based on nothing more than using Applicants' claims as a blueprint to pick and choose various isolated elements from the art.

In summary, because combining O'Neil et al. and MeLampy et al. would change the principle of operation of MeLampy et al., Applicants respectfully submit that one skilled in the art would not have been motivated to combine O'Neil et al. with MeLampy et al. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejections against Claims 1-22.

If there are any questions concerning this Response, the Examiner is asked to phone the undersigned attorney at (312) 321-4719.

Dated: February 2, 2005

Respectfully submitted,



Joseph F. Hetz
Reg. No. 41,070
Attorney for Applicants

BRINKS HOFER
GILSON & LIONE
P.O. Box 10395
Chicago, Illinois 60610
(312) 321-4719